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Additional Counsel on Signature Page

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

In re Lyft, Inc. Securities Litigation

Master File No. 4:19-cv-02690-HSG

This Document Relates to:
 ALL ACTIONS

CLASS ACTION

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER TO EXTEND
 BRIEFING SCHEDULE ON LYFT
 DEFENDANTS' MOTION TO DISMISS
 PLAINTIFF'S CONSOLIDATED
 AMENDED CLASS ACTION
 COMPLAINT FOR VIOLATION OF
 FEDERAL SECURITIES LAWS**

Pursuant to Local Rules 6-2 and 7-12, Defendants Lyft, Inc., Logan Green, John Zimmer, Brian Roberts, Prashant Aggarwal, Jonathan Christodoro, Ben Horowitz, Valerie Jarrett, David Lawee, Hiroshi Mikitani, Ann Miura-Ko, and Mary Agnes Wilderotter (the “Lyft Defendants”) and Lead Plaintiff, Rick Keiner (“Plaintiff”, and together with the Lyft Defendants, the “Parties”), through their counsel, submit the following Joint Stipulation and [Proposed] Order To Extend Briefing Schedule on Lyft Defendants’ Motion to Dismiss the Complaint.

WHEREAS, on March 24, 2020, the Parties filed a Joint Case Management Statement (ECF No. 71) jointly proposing the following schedule for Plaintiff’s amended complaint and Defendants’ motion to dismiss:

Event	Date
Consolidated Class Action Complaint	April 16, 2020
Motion to Dismiss or Other Response to Consolidated Class Action Complaint	May 14, 2020
Opposition to Motion to Dismiss	June 11, 2020
Reply in Support of Motion to Dismiss	July 2, 2020
Hearing on Motion to Dismiss	July 23, 2020

WHEREAS, on March 26, 2020, the Court issued a Scheduling Order setting a briefing schedule for Plaintiff’s amended complaint and Defendants’ motion to dismiss per the Parties’ joint proposal described above, and setting the hearing for Defendants’ motion to dismiss for July 23, 2020 at 2:00 p.m. (the “Scheduling Order”) (ECF No. 72)

WHEREAS, on April 16, 2020, Plaintiff filed the Consolidated Amended Class Action Complaint for Violation of the Federal Securities Laws (the “Complaint”) (ECF No. 74);

WHEREAS, on May 14, 2020, the Lyft Defendants filed their Motion to Dismiss the Complaint (ECF No. 78);

WHEREAS, on June 8, 2020, the Parties filed a Joint Stipulation and [Proposed] Order Granting Joint Administrative Motion For Leave to Exceed Page Limit, stipulating and agreeing that Plaintiff’s forthcoming opposition will not exceed thirty (30) pages, and Lyft Defendants’ reply shall not exceed twenty (20) pages (“Administrative Motion”) (ECF No. 81);

WHEREAS, on June 9, 2020, the Court granted the Parties’ Administrative Motion (ECF

No. 82);

WHEREAS, on June 11, 2020, Plaintiff filed his opposition to the Lyft Defendants' Motion to Dismiss the Complaint (the "Opposition") (ECF No. 84);

WHEREAS, pursuant to the Scheduling Order, the Lyft Defendants' Reply in Support of Motion to Dismiss the Complaint (the "Reply") is currently due to be filed on July 2, 2020;

WHEREAS, the Parties have met and conferred, and agree to extend the date for the Reply from July 2, 2020, to July 9, 2020;

WHEREAS, this extension of time will not alter the date of the hearing on the Motion to Dismiss, set for July 23, 2020, at 2:00 p.m.;

WHEREAS, this stipulation is not intended to operate as an admission of any factual allegation or legal conclusion and is submitted subject to and without waiver of any right, defense, affirmative defense, or objection;

NOW, THEREFORE, pursuant to Civil Local Rule 6-2, the Parties hereby stipulate, subject to Court approval, that the briefing schedule will be modified as follows:

1. The Lyft Defendants shall file a reply to Plaintiff's Opposition, not to exceed twenty (20) pages, by July 9, 2020.

Stipulated and agreed to by:

Date: June 23, 2020

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/s/ Jacob A. Walker

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FILER'S ATTESTATION

Pursuant to Civil L. R. 5-1(i)(3), regarding signatures, I hereby attest that concurrence in the filing of the document has been obtained from all of the signatories above.


Dated: June 23, 2020

/s/ Colleen C. Smith
Colleen C. Smith

* * *

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 6/24/2020


HONORABLE HAYWOOD S. GELLIAM, JR.
U.S. DISTRICT JUDGE